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Client No. 56824-0001

May 11, 2020

**Via ECF**

Honorable John K. Sherwood, U.S.B.J.  
United States Bankruptcy Court  
Martin Luther King, Jr. Federal Building & Courthouse  
50 Walnut Street, Third Floor  
Newark, New Jersey 07102

**Re: In re: New England Motor Freight, Inc., *et al.***  
**Chapter 11; Case No. 19-12809 (JKS)**

Dear Judge Sherwood:

This office represents Jalil Walters and Rasheeda Carter. The terms of the Auto Liability Claims Protocol Settlement Agreement (“Protocol”) state that during the ninety (90) days following the Effective Date, “the Holders of Auto Liability Claims and the Insurers shall engage in cooperative, informal exchanges and requests for information and other discovery, in a good faith effort to resolve the Auto Liability Claims.” Any claims not settled within the ninety (90) day period shall be submitted to mandatory mediation.

The initial ninety (90) day period has elapsed without resolution of the claim. Accordingly, please accept this mediation request. Pursuant to the terms of the Protocol, this referral shall occur automatically upon this request, without further action required of the Court.

Respectfully,

/s/ Sari B. Placona  
Sari B. Placona

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